

## REMARKS

Claims 1, 4-6, 8-12, 14, and 16-20 are pending. The Examiner's reconsideration of the rejections is respectfully requested in view of the amendments and remarks.

Applicants appreciate the Examiner's indication that claims 3-4 and 7-9 are objected to as being dependent upon a rejected base claim, but would be allowable if rewritten in independent form including all of the limitations of the base claim and any intervening claims.

Claims 1, 6, 11, and 17-20 have been rejected under 35 U.S.C. 103(a) over Ferrel et al. (U.S. Patnet No. 5,860,073) in view of Boag et al. (U.S. Patent No. 6,589,291). The Examiner stated essentially that the combined teachings of Ferrel ('073) and Boag teach or suggest all the limitations of claims 1, 6, 11, 17-18, and 19-20.

Claims 1 and 6 have been amended to include the allowable limitations of claims 3 and 7, respectively. Accordingly, claims 1 and 6 are believed to be in condition for allowance.

Claims 17 and 18 depend from claim 1. Claims 11, 19 and 20 depend from claim 6. The dependent claims are believed to be allowable for at least the reasons given for claims 1 and 6. The Examiner's reconsideration of the rejection is respectfully requested.

Claims 5 and 10 have been rejected under 35 U.S.C. 103(a) as being unpatentable over Ferrel ('073) and Boag as applied to claims 1 and 6, and further in view of Ferrel et al. (U.S. Patent No. 5,907,837). The Examiner stated essentially that Ferrel ('073), Boag and Ferrel ('837) teach or suggest all the limitations of claims 5 and 10.

Claim 5 depends from claim 1. Claim 10 depends from claim 6. The dependent claims are believed to be allowable for at least the reasons given for claims 1 and 6.

Claim 12 has been rejected under 35 U.S.C. 103 (a) over Sundaresan (U.S. Patent No. 6,487,566) in view of Stechmann (U.S. Patent No. 5,617,528). The Examiner stated essentially

that the combined teachings of Sundaresan and Stechmann teach or suggest all the limitations of claim 12.

Claim 12 claims, *inter alia*, “translating declarative card layout style specifications into procedural card-based presentations.”

Sundaresan discloses a system for specifying transformation rules of XML language documents into other XML language documents. (See Col. 5, lines 1 to 7 and col. 12, lines 45-49.) Sundaresan does not teach “translating declarative card layout style specifications into procedural card-based presentations” as claimed in claim 12. Sundaresan’s cross transformation of an XML document begins and ends with the same type of document, an XML document. XML is a text format that describes data. An example of an XML may include the following:

```
<note>
<to>...</to>
<from>...</from>
<heading>...</heading>
<body>...</body>
</note>
```

No style information or procedural information is provided for in XML. Thus, a transformation from one XML document to another XML document is not analogous to “translating declarative card layout style specifications into procedural card-based presentations” as claimed in claim 12. An XML document as taught by Sundaresan is not a declarative card layout style specification or a procedural card-based presentation. Therefore, Sundaresan does not teach or suggest, “translating declarative card layout style specifications into procedural card-based presentations”, as claimed in claim 12. Therefore, Sundaresan fails to teach all the limitations of claim 12.

Stechmann discloses a method and apparatus for interactively creating photo identification cards (see Abstract). The method and apparatus for creating photo identification cards uses a predetermined card design that specifies positions on the card for layout frames of a video picture and cardholder information which are to be printed on the card (see col. 1, lines 54-62). Stechmann does not teach or suggest, “translating declarative card layout style specifications into procedural card-based presentations” as claimed in claim 12. In the Response to Arguments found in the Final Office Action, the Examiner has stated “The claim language of claim 12 is interpreted as a translation being performed from one specification into another specification as taught by Sundaresan.” In view of this interpretation, the Examiner’s attention is drawn to Figures 2 and 4 and Figures 3 and 5, which depict examples of translations from a declarative card layout style specification to procedural card-based presentation. Clearly, the mere merging of content into a card template as taught by Stechmann is not a translation from a declarative card layout style specification to a procedural card-based presentation, essentially as claimed in claim 12. For example, nowhere does Stechmann teach or suggest a translation of the card template into another template, much less from a declarative card layout style specification to a procedural card-based presentation. Therefore, Stechmann’s method for creating photo identification cards does not teach or suggest, “translating declarative card layout style specifications into procedural card-based presentations”, as claimed in claim 12. Therefore, Stechmann fails to cure the deficiencies of Sundaresan.

The combined teachings of Sundaresan and Stechmann fail to teach or suggest, “translating declarative card layout style specifications into procedural card-based presentations” as claimed in claim 12. The Examiner’s reconsideration of the rejection is respectfully requested.

Claim 14 has been rejected under 35 U.S.C. 103 (a) over Sundaresan and Stechmann as applied to claim 14, and further in view of Shimizu (U.S. Patent No. 6,374,271). The Examiner stated essentially that the combined teachings of Sundaresan, Stechmann, and Shimizu teach or suggest all the limitations of claim 14.

Claim 14 depends from claim 12. Claim 14 is believed to be allowable for at least the reasons given for claim 12. The Examiner's reconsideration of the rejection is respectfully requested.

Claim 16 have been rejected under 35 U.S.C. 103(a) as being unpatentable over Sundaresan and Stechmann as applied to claim 12, and further in view of Ross et al. (U.S. Patent No. 6,026,417). The Examiner stated essentially that the combined teachings of Sundaresan, Stechmann, and Ross teach or suggest all the limitations of claim 16.

Claim 16 depends from claim 12. Claim 16 is believed to be allowable for at least the reasons given for claim 12. The Examiner's reconsideration of the rejection is respectfully requested.

For the forgoing reasons, the present application, including claims 1, 4-6, 8-12, 14, and 16-20, is believed to be in condition for allowance. The Examiner's early and favorable action is respectfully urged.

Respectfully submitted,

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